

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TROY LAMONT MOORE, SR. : CIVIL ACTION  
V. : NO. 14-3873  
MARGARET MCGROGAN, RN, et al. :

ANSWER AND AFFIRMATIVE DEFENSES OF MARGARET MCGROGAN, RN TO  
THE COMPLAINT OF TROY LAMONT MOORE, SR.

Defendant, Margaret McGrogan, RN (“McGrogan”) answers the complaint of Troy Lamont Moore, Sr. (“Moore”) as follows:

I. PARTIES

A. Denied. After reasonable investigation McGrogan lacks sufficient knowledge and information to form a belief as to the truth or falsity of these averments. Therefore they are denied.

B-1. Admitted. It is admitted that Louis Giorla has an office at 8301 State Road, Philadelphia, PA.

B-2. Denied. This individual is not properly identified. I do not know whom you are referring to. Therefore the paragraph is denied. McGrogan lacks sufficient knowledge and information to form a belief as to the truth or falsity of these averments. Therefore they are denied.

B-3. Denied. This individual is not properly identified. I do not know whom you are referring to. Therefore the paragraph is denied. McGrogan lacks knowledge and information to form a belief as to the truth or falsity of these averments. Therefore they are denied.

B-4. Admitted. I am a nurse and employed at that location. However, the Industrial Center is not my employer.

II. STATEMENT OF CLAIM

A-C. Denied. McGrogan is not in possession or control of Moore’s medical records. After reasonable investigation McGrogan lacks sufficient knowledge and information to form a